



ONTARIO
RIVERS
ALLIANCE

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Bree Walpole
Senior Policy Advisor
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
300 Water Street
Peterborough, ON
K9J 8M5

By Email: ESA.Permits.Agreements@ontario.ca

Re: EBR Registry Number: 012-8234
Development of the Safe Harbour Policy under the Endangered Species Act, 2007

Dear Ms. Walpole:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, organizations, and private and First Nation citizens who have come together to protect, conserve and restore healthy river ecosystems.

ORA is pleased for the opportunity to comment on the draft Safe Harbour Policy that has a primary goal of supporting stewardship-driven and/or beneficial activities focused on the protection, recovery and overall benefit of species at risk in Ontario.

ORA is generally supportive of the draft policy document; however, we have concern with Section 7.0 which indicates that *“once the term of the safe harbour instrument has been reached, and the proponent has satisfied the conditions of the instrument, that the proponent will have the option to undertake activities in the created or enhanced habitat that may damage or destroy the habitat, including any kill, harm, harassment, capture, or take of a member of a species at risk that is necessary while carrying out that activity”*.

ORA submits that every effort should be made to avoid the killing, harming or harassment of species at risk; and that Section 7 should not apply to a proponent that was issued an Overall Benefit Permit because their activities were likely to have an adverse effect on a species at risk or their habitat. A proponent must ensure that healthy compensatory habitat for a species at risk is maintained throughout the life of the Project.

ORA is very much in support of incentives and programs designed to encourage stewardship in the protection and recovery of species at risk in Ontario.



The biggest barrier to private individuals and landowners taking on such an important task is a lack of knowledge. Therefore, it would be very helpful if the MNRF were to make instructional online material available, that promotes and demonstrates the possibilities of how property owners can help protect and recover species at risk.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance